

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>Case No.: 3:07-cr-80-WHA</b>
	)	
<b>ALEXIS RAMON HERRERA-FLORES</b>	)	

**UNOPPOSED MOTION TO CONTINUE ARRAIGNMENT**

**COMES NOW** the Defendant, by undersigned counsel, and respectfully moves to continue this Arraignment, now scheduled for April 18, 2007.

In support of this Motion, the Defendant would show:

1. Defense counsel relies on the grounds stated in the Motion for Mental Competency Examination (Doc. 14), filed simultaneously with this Motion.
2. Because Defense counsel has substantial doubt as to this Defendant's competence to stand trial, defense counsel respectfully requests that this Arraignment be continued until the Defendant may be examined and the question of his competence to stand trial is resolved.
3. Undersigned counsel has communicated this Motion to the United States. While the government has no knowledge of the Defendant's competence and is not taking a position on that matter, the government does not oppose this Motion.

WHEREFORE, Defendant requests that this Motion be granted.

Respectfully submitted,

**s/Christine A. Freeman**  
**CHRISTINE A. FREEMAN**

**TN BAR NO.: 11892**

Attorney for Alexis Ramon Herrera-Flores  
Federal Defenders  
Middle District of Alabama  
201 Monroe Street , Suite 407  
Montgomery, AL 36104  
TEL: (334) 834-2099  
FAX: (334) 834-0353  
E-Mail: Christine\_Freeman@fd.org

**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Nathan D. Stump, Esquire, Assistant United States Attorney, One Court Square, Suite 201, Montgomery, Alabama 36104.

**s/Christine A. Freeman**

**CHRISTINE A. FREEMAN**

**TN BAR NO.: 11892**

Attorney for Alexis Ramon Herrera-Flores  
Federal Defenders  
Middle District of Alabama  
201 Monroe Street , Suite 407  
Montgomery, AL 36104  
TEL: (334) 834-2099  
FAX: (334) 834-0353  
E-Mail: [Christine\\_Freeman@fd.org](mailto:Christine_Freeman@fd.org)